

**MGRA DATA REQUEST: MGRA-SDG&E-03**  
**R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR**  
**SDG&E RESPONSE**

**Date Received: September 27, 2019**

**Date Submitted: October 7, 2019**

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**I. GENERAL OBJECTIONS**

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.
2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek “all documents” or “each and every document” and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.
3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.
4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel’s legal research, analyses or theories.
5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence.
6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.
7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.
8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.
9. SDG&E objects generally to each request to the extent that the request would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

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10. SDG&E objects generally to each request that calls for information that contains trade secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order.

**II. EXPRESS RESERVATIONS**

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.
2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.
3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.
4. These responses are made solely for the purpose of this proceeding and for no other purpose.

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**III. RESPONSES**

The following questions are in regard to SDG&E's September 17, 2019 PowerPoint "Wildfire Mitigation" presentation provided to the R.18-10-007 service list:

**QUESTION 1:**

SDG&E claims to have 55,000 targeted trees (eucalyptus, oak, sycamore, pine) in the HFTD, of which 5,837 had been pruned to 25 feet and 624 had been removed at the time of the presentation. Are all 55,000 targeted trees slated for either removal or 25' trim? If not, how many trees are estimated to require 25' trim, and how many are estimated to require removal?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 5. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 1:**

After reviewing the vegetation management data in connection with this response, SDG&E has determined that several of the figures set forth in the question (and in the presentation from which they were drawn) were incorrect. The errors resulted from incorrect queries to SDG&E's database, Powerworkz, which is being refined to ensure that SDG&E accurately quantifies and reports on the targeted population of trees for enhanced vegetation management and the number of trees completed within the HFTD. After additional review of the Powerworkz reports, the number of targeted trees has been revised and the targeted population is now approximately 81,000 trees.

Since implementing its enhanced vegetation management in 2019, SDG&E has pruned 2,405 trees to achieve a 25 feet clearance and removed 512 trees. SDG&E is still analyzing how best to address the remaining targeted trees. Whether the target trees will be subject to increased clearances or removal is based on factors including anticipated growth rate, tree health, and the likelihood of strike potential (i.e., whether the tree could potentially strike a power line either due to failure at ground-level or branch breakout within the canopy). The determination of whether a tree is a candidate for increased clearances or removal is made on a specific tree by tree basis during the time of inspection. Until all inspections are complete, the number of those trees requiring removal versus trim is unknown.

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**QUESTION 2:**

What additional criteria, aside from tree species, are used to determine whether trees require 25' trim or removal?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 5. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 2:**

In addition to considering the tree species, SDG&E utilizes several factors and criteria when determining whether a tree requires 25 feet pruning or removal, including tree height, tree health, current conductor clearance, anticipated tree growth, likelihood of branch/tree failure, strike potential, environmental conditions, and movement of tree and line by wind.

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**QUESTION 3:**

Please provide scientific evidence or other data showing that 25' clearance will reduce risk under wildfire conditions.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5 and 8. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 3:**

As explained in its 2019 Wildfire Mitigation Plan (WMP), SDG&E has begun the process to integrate more data science into its vegetation management plan to support a more analytical approach to mitigation fire risk associated with tree and power line conflicts. Using advanced analytics and data science, SDG&E has developed a Vegetation Risk Index to help identify the highest risk vegetation areas in its service territory, where the presence of trees may pose a threat to electrical infrastructure. SDG&E is analyzing data from hundreds of thousands of trees, historical power outages, and historical weather data in an effort to prevent tree-related outages and tree-related ignitions before they occur, which will reduce the risk of wildfires. SDG&E can also use this information to deploy crews to these high-risk vegetation areas in advance of strong Santa Ana Winds to ensure the vegetation near the power lines are safe.

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**QUESTION 4:**

SDG&E states that weather stations have: “Enabled 30 second data to support emergency operations.” Is 30 second data enabled on all SDG&E weather stations? If not how many? Is this data available to parties or researchers other than to support emergency operations? And if so what is the access process for the data?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 5. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 4:**

SDG&E is in the process of enabling 30 second data reads at all of its 190 weather stations. As of October 1, 2019, approximately 59 weather stations are enabled to report at 30 second intervals. At this time, the data retrieved from 30 second reporting weather stations supports emergency operations only and is only enabled for short periods to support real-time decision making.

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**QUESTION 5:**

In its SDG&E mentions a mobile phone app called “Fire Science & Climate Adaptation Application”, that allows weather access and push notifications. Is this a publicly available mobile application? If so, where can it be accessed? If not are there any plans to make it publicly available, and what would be the timeline?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 5. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 5:**

SDG&E’s Fire Science and Climate Adaptation Application is available in the Apple App Store and Google Play. This app was designed to enhance situational awareness for our employees and contractors who are working to keep our communities safe.

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**QUESTION 6:**

If small conductor is used within a circuit, does it generally constitute the entire circuit? Does it constitute the entirety of a segment of a circuit?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 5. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 6:**

When power lines were installed in the past, electrical current carrying capacity was the main driver in sizing the primary distribution conductor. Typically, conductors near a substation require more electrical current and are larger while sections off the main feeder that branch off to serve small customer sections utilize smaller conductor. In some of the more rural circuits however, the electrical demand was small even from the substation, so small wire could be used throughout the entire circuit.

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**QUESTION 7:**

How does SDG&E define a “wire down” event?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 5. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 7:**

Consistent with the investor owned utilities’ (IOU) Safety Modeling Assessment Proceeding (S-MAP) metric definition, SDG&E defines a wire down as: “an electric transmission or primary distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object; excludes down secondary distribution wires.” SDG&E has limitations in reporting and tracking, where wire downs are only reported if they are associated with an unplanned outage. There are rare instances where a wire down may be associated with a planned outage, and these rare events would not be reported unless the wire down caused an unplanned outage.

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**QUESTION 8:**

What “cause” classifications does SDG&E currently use for classifying wire-down event data?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 5. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 8:**

SDG&E associates wire downs with electric unplanned outages, and therefore applies outage cause codes to these events. Major and common categories may include conductor failure, connector failure, vehicle contact, foreign object contact, vegetation contact, and extreme weather events.

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**QUESTION 9:**

If a conductor is found to be hanging less than 8 feet from the ground, how would SDG&E classify this event, and what data set would this information appear in?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 5. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 9:**

If a conductor was found to be hanging less than 8 feet from the ground, SDG&E would not categorize such event as a wire down, as it does not meet SDG&E's definition of a wire down. See response to Question 7 above.